REMARKS

As a preliminary matter, Applicants thank the Examiner for the acknowledgement of allowable subject matter in claim 60. Accordingly, claim 60 has been rewritten in independent form herein, and Applicants submit that claim 60 is now in condition for allowance in light of these amendments.

Claim 114 stands rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Examiner asserts that the Specification does not describe the limitation where impulse control is carried out when the display image is shown with all of the pixel electrodes of a liquid crystal panel and is a moving image. In response, Applicants respectfully direct the Examiner's attention to Figs. 10 and 45 of the present Application, which fully support the cited limitation. Applicants have further amended claim 114 to more clearly recite that the display image is shown with all of the pixel electrodes during the predetermined period defined elsewhere in the claim. Further textural support for claim 114, as well as the amendments to the claim, can be found at least at page 41, lines 12-14 of the Specification.

More specifically, Fig. 10 of the present invention, for example, shows all of the scanning lines G1-G6 becoming active in one frame period, and the display data being supplied to all pixel electrodes by the signal lines. Moreover, there is no contradiction in the two claim limitations cited by the Examiner. The Examiner appears to have confused the timing in which the images are output, with the actual pixels that are used to display the images themselves. A moving image may be displayed with all of the pixel electrodes on the

liquid crystal panel, without having to be displayed for all of one frame period. There is thus no contradiction between the amount of time an image is displayed, and the number of pixels used to display that image. Accordingly, reconsideration and withdrawal of the Section 112 rejection of claim 114 is respectfully requested for at least these reasons.

Claims 50, 57, and 115 stand rejected under 35 U.S.C. 102(e) as being anticipated by Akimoto et al. (U.S. 6,329,973). Claims 50 and 115 have been cancelled without prejudice, rendering the rejection thereto now moot. Similarly, claim 57 has been amended to now depend from independent claim 114, and Applicants submit that the rejection of claim 57 is therefore now moot as well.

Claims 114 and 115 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Akimoto in view of Fujiyoshi (U.S. 6,211,854). As discussed above, claim 115 has been cancelled without prejudice, rendering the rejection thereto now moot. With respect to claim 114, Applicants traverse the rejection because neither of the cited references, whether taken alone or in combination, teach or suggest the impulse control of claim 114 of the present invention, as amended.

Similar to the discussion above with respect to the Section 112 rejection, the Examiner appears to have again confused the timing for which an image is displayed, with the actual pixels that display the image. On page 4 of the outstanding Office Action (Paper No. 20), the Examiner incorrectly defines the predetermined *period* for the impulse control to be "a period from a third row to a sixth row," and the entire one frame *period* as "a period from a first row to eight (sic) row." The third row to the sixth row, and the first row to the

eighth row, however, are not *timing periods*, as asserted by the Examiner, but instead the actual lines of pixels used to display an image. Accordingly, the Examiner has not cited to anything in the Akimoto reference that is comparable to the impulse control and related timing recited in the present invention.

Impulse control, as defined in claim 114 of the present invention, is a data output control function, and one which is not concerned with the sequence or order of scanning lines. Impulse control is a function used to display image data only during a certain portion of one frame period. Those skilled in the art are well apprised that "one frame period," and the portion of this timing period used for impulse control, would both be timing periods only, and would not refer to the portion of the pixel electrodes that physically display the image. For at least these reasons, a *prima facie* case of obviousness has not been established against the present invention. Section 2143.03 of the MPEP requires of the Examiner that he cite to where in the prior art is taught each and every feature of the present invention. In the present case, however, the Examiner has not cited to any teaching or suggestion within the Akimoto reference for the impulse control and timing features of claim 114 of the present invention.

In fact, the Examiner's comments serve to even support Applicants' previous arguments, namely, that Akimoto fails to teach or suggest an image displayed with all pixel electrodes of the device. The Examiner expressly acknowledges that the portion from the third row to the sixth row of Akimoto's device does not display the same image as the pixels of the rest of the device. Applicants submit that once the Examiner resolves the conflict in

the understanding of the differences between the timing for displaying an image, versus the number of pixels which actually display the image during such timing, he will realize that Akimoto does not read upon the recited features of the present invention.

Similarly, Fujiyoshi also fails to teach or suggest the impulse control of the present invention. Fujiyoshi teaches that moving images are displayed by a progressive driving technique, and that still images are displayed by an interlace driving technique. (See col. 6, lines 44-49). According to the progressive driving technique, scanning lines are sequentially scanned, whereas scanning lines are interlace scanned in the interlace driving technique. Neither of these techniques, however, teach or suggest anything like the impulse control as defined in claim 114 of the present invention. Accordingly, Fujiyoshi fails to make up for the clear deficiencies in the Akimoto reference noted above, and a *prima facie* case of obviousness has therefore again not been established against the present invention, and the rejection should further be withdrawn.

Additionally, the Examiner has not cited to any motivation within the two prior art references themselves for teaching or suggesting a combination of the two references. Because the Examiner has not cited to any incontestable well known principle in the field of art suggesting the proposed combination, the teaching or suggestion for the motivation to combine the references must come from within the references themselves. The Examiner's own personal understanding of the art and rationale for the combination are not sufficient. See In re Lee, 277 F.3d 1338, 61 U.S.P.Q. 2d 1430 (Fed. Cir. 2002). Because the Examiner has not based the rationale for the proposed combination on any specific teaching from the

references, Applicants submit that the *prima facie* case of obviousness is deficient for at least these reasons as well, and the outstanding rejection should again be withdrawn.

Moreover, Applicants submit that no motivation for combining the two cited references could be found within either reference. Akimoto is drawn toward a system to change the rewriting speed of a displayed image according to whether the image is a still image or a moving image. Fujiyoshi, on the other hand, is drawn toward a device to judge whether an image is a still image, when a series of images are found to be the same. Neither of these two references, alone or together, teaches or suggests to actually switch two output control functions between moving images and still images, as in claim 114 of the present invention. Fujiyoshi only judges still images, and Akimoto only changes speeds between moving images and still images. Neither is relevant to the present invention, which features the switch between two output control functions (impulse and hold) between moving images and still images, and for all pixels of the device. Accordingly, it could not be obvious to combine the two references to reach the present invention, when neither reference is capable of accomplishing these features of the present invention, alone or together.

Claims 51-52 and 58 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Akimoto in view of Matsuzaki et al. (U.S. 5,644,332). Claims 51-52 and 58 have been amended to now depend from independent claim 114 of the present invention, and Applicants submit that this rejection is now moot in light of these amendments.

Claim 53 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Akimoto in view of Numao (U.S. 5,103,328). Claim 53 has also been amended to now

depend from independent claim 114, and Applicants submit that this rejection is also now moot in light of this amendment.

Claims 55-56 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Akimoto in view of Terasaki (U.S. 5,844,540). Claim 55 has also been amended to now depend from independent claim 114, and claim 56 depends from claim 55, and therefore Applicants submit that this rejection is also now moot in light of this amendment.

For all of the foregoing reasons, Applicants submit that this Application, including claims 51-53, 55-58, 60, and 114, is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned Attorney if an interview would expedite prosecution.

Respectfully submitted,

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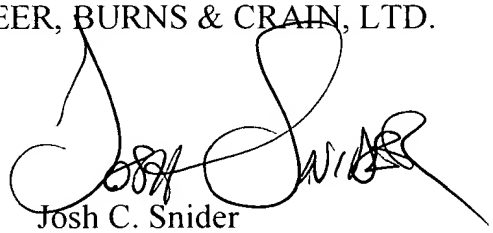

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